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July 8, 1999 8 PM 3 41

Guy M. Hicks
General Counsel

OFFICE OF THE
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Third Party Testing of BellSouth's Operational Support Systems*
Docket No. 99-00347

Dear Mr. Waddell:

In its Response to AT&T's Petition for the Establishment of an Independent Third Party Testing Program of Operational Support Systems ("OSS"), BellSouth explained why the Authority should monitor the third-party testing program ordered by the Georgia Public Service Commission ("GPSC") and decline to institute an additional testing program of BellSouth's OSS at this juncture. As stated in BellSouth's response to AT&T's petition, BellSouth should not be required to duplicate, in each state, third-party testing of its regional systems. This is especially true given that the results of third-party testing in Georgia will be equally relevant to the Authority's evaluation of BellSouth's OSS in Tennessee.

BellSouth also agreed to keep the Authority informed fully of the status of the testing being conducted under the auspices of the GPSC. In that regard, enclosed are fourteen copies of the GPSC's June 28, 1999 Order approving BellSouth's OSS Evaluation Master Test Plan and Flow Through Audit Plan ("Test Plan"). The Test Plan, which is being conducted by independent third parties, was found by the GPSC to be thorough, well-balanced, and in compliance with prior GPSC orders. Copies of the actual Test Plan will be provided to the Authority in the near future.

Thank you for your attention to this matter.

Very truly yours,

Guy M. Hicks

GMH:ch

COMMISSIONERS:

STAN WISE, CHAIRMAN
ROBERT B. BAKER, JR.
DAVID L. BURGESS
BOB DURDEN
LAUREN "BUBBA" McDONALD, JR.



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Docket No. 8354-U

ORDER APPROVING BELL SOUTH'S THIRD PARTY TESTING PLAN

In re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems

On May 20, 1999, the Georgia Public Service Commission ("Commission") issued an Order to establish a third party testing program of the operational support systems ("OSS") of BellSouth Telecommunications, Inc. ("BellSouth"). In this Order, the Commission directed BellSouth to file with the Commission a proposed plan for third party testing. On June 1, 1999, AT&T Communications of the Southern States, Inc. (AT&T) filed a motion for reconsideration of the Commission's May 20, 1999 Order. Also on June 1, 1999, BellSouth filed its proposed OSS Evaluation Master Test Plan & Flow-Through Audit Plan (BellSouth's Plan) with the Commission. On June 9, 1999, BellSouth filed with the Commission revised Network Configuration diagrams for Scenarios 420-445 in Appendix B3 of BellSouth's Plan. Since BellSouth's Plan was filed, AT&T and numerous other parties have filed comments with the Commission regarding the plan. Several parties requested that the Commission expand the scope of the testing. In addition, some parties requested that the Commission increase the opportunity for CLEC input during the testing.

After reviewing BellSouth's Plan, the Commission finds that BellSouth has prepared a thorough, well-balanced plan which complies with the May 20, 1999 Order. As the Commission stated in its prior Order, the testing of BellSouth's OSS by an outside party is a worthwhile endeavor. The suggestion to greatly expand the scope of the testing, however, is unwarranted. The Commission has been deeply involved in overseeing the development of BellSouth's OSS for three years, and its intent in ordering third-party testing is to conduct a focused, supervised audit of BellSouth's OSS. The Commission has previously reviewed substantial documentation regarding the development and operation of BellSouth's OSS. The Commission has solicited comments from CLECs regarding issues associated with the implementation of BellSouth's OSS, has conducted a workshop which considered approximately 100 issues raised by the CLECs, and has issued specific directions to BellSouth regarding the enhancements necessary to bring its OSS into compliance with the requirements of the Federal and State acts. The Commission has monitored the progress toward the completion of these enhancements in this docket through the submission of monthly reports for the last year from BellSouth and the industry. In addition, through the adoption of performance measurements in Docket 7892-U and the monthly reports that have been filed by BellSouth over the

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last year, the Commission has reviewed a substantial amount of data regarding the performance of BellSouth's OSS, as well as the overall performance of BellSouth in the pre-ordering, ordering, provisioning, maintenance, repair, and billing of resold services and unbundled network elements. Finally, over the last three years, the Commission has held numerous hearings relating to the development and operation of BellSouth's OSS.

Because of the substantial involvement of the Commission in the development and operation of BellSouth's OSS noted above, the Commission does not believe that a full third party audit of all interfaces and services is necessary at this time. The plan presented by BellSouth will result in a focused audit on those areas where BellSouth has not yet experienced significant commercial usage, and where CLECs have expressed concerns regarding operational readiness.

As stated above, some parties also requested that the Commission increase the opportunity for CLEC input during the testing. Some CLEC's were concerned that the only official mechanism for CLEC input under BellSouth's Plan was to file a response to the final report after all the testing had been completed. The Commission agrees that it is important that the CLEC community, and other interested parties, have a more timely mechanism for providing input into the process. BellSouth's Plan already provides for periodic interim reporting. The Commission finds that when these interim reports are filed, copies of them shall also be served on all intervenors in this matter. The intervenors shall then be given the opportunity to file a response to the interim reports. Such responses shall be filed with the Commission and served on all parties in this matter in compliance with the rules of the Commission.

WHEREFORE IT IS ORDERED, that BellSouth's proposed OSS Evaluation Master Test Plan & Flow-Through Audit Plan, as revised by BellSouth on June 9, 1999, is hereby approved subject to the modifications set forth in this order.

ORDERED FURTHER, that BellSouth's Plan is hereby modified, as set forth in the body of this order, to provide the opportunity for intervenors to file responses to the interim reports made under BellSouth's Plan.

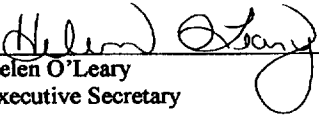
ORDERED FURTHER, BellSouth shall initiate and complete its testing plan in compliance with the terms, conditions, and scope set forth in the orders of this Commission and in the OSS Evaluation Master Test Plan & Flow-Through Audit Plan, as revised on June 9, 1999.

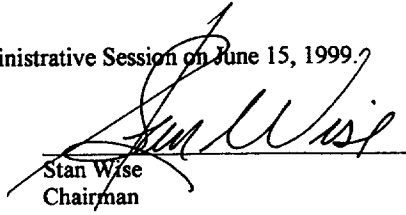
ORDERED FURTHER, that all findings, conclusions, and statements set forth in the preceding sections of this Order are adopted as findings of fact, conclusions of law, and statements of regulatory policy of this Commission.

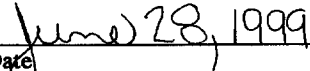
ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

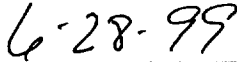
ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on June 15, 1999.


Helen O'Leary
Executive Secretary


Stan Wise
Chairman


Date


Date

CERTIFICATE OF SERVICE

I hereby certify that on July 8, 1999, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

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